

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

MIDNIGHT MADNESS DISTILLING  
Debtor.

Case No.: 21-11750-PMM

Chapter 7 case

BONNIE B. FINKEL, in her capacity as Chapter  
7 Trustee for Midnight Madness Distilling,

Plaintiff,

v.

Adv. Pro. No.: 23-00047-PMM

CASEY PARZYCH; SHAWN SHEEHAN;  
ANGUS RITTENBURG, KELLY FESTA,  
ASHLEIGH BALDWIN; MICHAEL BOYER;  
R.F. CULBERTSON; GARY PARZYCH; RYAN  
USZESNKI; POLEBRIDGE LLC; GOOD  
DESIGN, INC.; AGTECH PA LLC; AGTECH VI,  
LLC; XO ENERGY WORLDWIDE LLLP; XO  
EW, LLC; CAN MAN LLC; BEST BEV, LLC;  
ETOH WORLDWIDE, LLC; CANVAS 340, LLC;  
FINLAND LEASING CO., INC.; and EUGENE T.  
PARZYCH, INC.

Defendants.

**LIMITED OBJECTION TO MOTION OF KURZMAN | STEADY, LLC FOR AN  
ORDER GRANTING LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANTS  
RYAN USZENSKI, CAN MAN LLC, FINLAND LEASING CO., INC. AND EUGENE G.  
PARZYCH, INC.**

Defendants AgTech PA LLC; Ashleigh Baldwin; Best Bev, LLC; Michael Boyer; Canvas  
340 LLC; R.F. Culbertson; Kelly Festa; Good Design, Inc.; Best Bev, LLC; Casey Parzych;  
Polebridge, LLC; Angus Rittenburg; Shawn Sheehan; XO EW, LLC; and XO Energy Worldwide,  
LLLP (collectively, the "KLG Defendants"), by and through undersigned counsel, hereby file

this limited objection (the “**Limited Objection**”) to the Motion (the “**Motion**”) of Kurtzman | Steady, LLC (the “**Movant**”) for an Order Granting Leave to Withdraw as Counsel for Defendants Gary Parzych; Ryan Uszenski; Can Man LLC; Finland Leasing Co., Inc.; and Eugene T. Parzych, Inc. (the “**Kurtzman Defendants**”).

The KLG Defendants do not take a position on the Movant’s withdrawal itself – that is between the Movant and the Kurtzman Defendants. However, the Motion states that K&L Gates LLP could assume the representation of the Kurtzman Defendants. However, none of the Kurtzman Defendants are clients of K&L Gates LLP and have not requested that K&L Gates LLP represent them. Thus, it is improper to request that the Court transfer responsibility of the Kurtzman Defendants to K&L Gates LLP.

**WHEREFORE**, KLG Defendants respectfully request that this Honorable Court deny the Motion to the extent it is improperly seeking to transfer unrepresented clients to K&L Gates LLP, and, if Movant is allowed to withdraw, order the Kurtzman Defendants, to the extent they cannot represent themselves *pro se*, to obtain counsel within the next 30 days, and any other relief the Court deems just and proper.

Dated: December 16, 2024

**K&L GATES LLP**

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*Attorneys for Casey Parzych; Shawn Sheehan; Angus Rittenburg; Ashleigh Baldwin; R.F. Culbertson; Michael Boyer; Kelly Festa, Polebridge, LLC; Good Design, Inc.; AgTech PA LLC; XO Energy Worldwide, LLLP; XO EW, LLC; Best Bev, LLC;; and Canvas 340 LLC*

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Defendants.

**CERTIFICATE OF SERVICE**

I, Steven Caponi, hereby certify that on December 16, 2024, I served a copy of the forgoing Limited Objection via CM/ECF on all counsel registered to receive electronic service via CM/ECF.

/s/ Steven L. Caponi  
Steven L. Caponi